

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

WILL McRANEY

PLAINTIFF

V.

No. 1:17cv080-GHD-DAS

**THE NORTH AMERICAN MISSION BOARD
OF THE SOUTHERN BAPTIST CONVENTION, INC.**

DEFENDANT

**THE NORTH AMERICAN MISSION BOARD OF THE SOUTHERN BAPTIST
CONVENTION, INC.'S RESPONSE IN OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Defendant The North American Mission Board of the Southern Baptist Convention, Inc. (“NAMB”), hereby files this Response in Opposition to Plaintiff’s Motion for Summary Judgment with Respect to NAMB’s “Separation Agreement Defenses” (Dkt. No. 265).

NAMB’s Response is supported by the memorandum brief being filed contemporaneously herewith. For the reasons described in the memorandum brief, Plaintiff’s Motion for Summary Judgment should be denied.

WHEREFORE, PREMISES CONSIDERED, NAMB respectfully requests that this Court deny Plaintiff’s Motion for Summary Judgment.

Respectfully submitted, this 1st day of June, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court the using the Court's ECF system, which sent notification of such filing to all counsel of record.

SO CERTIFIED, this 1st day of June, 2023.

s/ Timothy Jeffrey Perla

TIMOTHY JEFFREY PERLA